

Paul S. Bliley, Jr., VSB #13973  
Williams Mullen  
P.O. Box 1320  
Richmond, VA 23218-1320  
Telephone: (804) 420-6448  
Fax: (804) 420-6507  
[pbliley@williamsmullen.com](mailto:pbliley@williamsmullen.com)  
Counsel to Crown CCI, LLC

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

IN RE: ) Chapter 11  
          ) Case No. 08-35653 (KRH)  
CIRCUIT CITY STORES, INC., et al., )  
          ) Jointly Administered  
Debtors. )

**RESPONSE OF CROWN CCI, LLC  
TO LIQUIDATING TRUST'S SEVENTEENTH OMNIBUS OBJECTION TO  
LANDLORD CLAIMS (REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS,  
RECLASSIFICATION OF CERTAIN MISCLASSIFIED CLAIMS, DISALLOWANCE  
OF CERTAIN INVALID CLAIMS, DISALLOWANCE OF CERTAIN LATE FILED  
CLAIMS, DISALLOWANCE OF CERTAIN DUPLICATE CLAIMS, AND  
DISALLOWANCE OF CERTAIN AMENDED CLAIMS)**

Comes now Crown CCI, LLC, a previous landlord of the Debtor, Circuit City Stores, Inc.  
and for its response to the Liquidating Trustee's Seventeenth Omnibus Objection to Landlord  
Claims, Docket Number 10061 states as follows:

1. The Claimant's Name is Crown CCI, LLC ("Crown"), which was previously a  
Landlord for a Circuit City Store located in Hawthorne, California.
2. On January 28, 2009 Crown filed a pre-petition Proof of Claim designated as  
Claim Number 7631 in the amount of \$72,583.22. The Trustee's Objection seeks to reduce this  
claim to \$69,711.25. The basis for the reduction is the inclusion of the date of filing as part of

the pre-petition claim, when it should be part of the post-petition claim. Crown does not contest this reduction.

3. On June 19, 2009 Crown filed an Administrative Proof of Claim designated as Claim Number 13467 in the amount of \$68,381.33, which included the claim for the “Stub” portion of the rent and the attorneys’ fees and expenses incurred by Crown in connection with enforcement of its Lease obligation in the amount of \$6,455.09.

4. The Trustee has responded to this claim asserted it should be a general unsecured claim, not an administrative claim and has objected to the claimed attorneys’ fees on the basis the Debtor’s books and records do not support same. The objection also seeks to reduce the claim by \$6,455.09 in attorneys’ fees, which the Liquidating Trustee claims are “not valid”.

5. The person with personal knowledge of the relevant facts supporting the response is Wendy Huang, General Counsel for Crown, 18201 Von Karmon Avenue, Suite 950, Irvine, CA 92612, Telephone Number (949) 476-2200.

6. The Bankruptcy Court should overrule the objections to this claim because the claim is an administrative claim not a general unsecured claim and contains post-petition expenses and charges including “stub” rent and attorney’s fees incurred which to are valid expenses incurred by the Debtor subsequent to the filing of the Bankruptcy Petition. The attorneys’ fees incurred are the obligations of Circuit City under the Lease between Circuit City and Crown. Crown intends to introduce documentation to support its claim through its Lease and statements of the attorneys’ fees incurred in connection with this matter. The Debtor is obligated to pay these sums pursuant to 11 U.S.C. §365(d)(3). See also, In re Trak Auto Corporation, 277 B. R. 655 (Bkrtcy. E.D. Va. 2002)

6. The claimants address, telephone number, fax number and the claimant's attorney to whom the attorneys for the Debtor should serve a reply to the response are as follows:

Crown CCI, LLC  
c/o Wendy Huang, General Counsel  
18201 Von Karman Avenue  
Suite 905  
Irvine, CA 92612  
(949) 476-2200

Attorney: Paul S. Bliley, Jr.

Paul S. Bliley, Jr., Esquire  
Williams Mullen  
P.O. Box 1320  
Richmond, VA 23218-1320  
[pbliley@williamsmullen.com](mailto:pbliley@williamsmullen.com)  
Telephone: (804) 420-6448  
Fax: (804) 420-6507

7. The name, address, telephone number and fax number of the party to reconcile, settle or otherwise resolve the objection on the claimant's behalf is the attorney set forth above.

Dated: April 7, 2011

CROWN CCI, LLC

By /s/ Paul S. Bliley, Jr.  
Of Counsel

Paul S. Bliley, Jr., VSB No. 13973  
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pbliley@williamsmullen.com  
Counsel for Crown CCI, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on the 7th day of April, 2011, I caused a copy of the foregoing to be served by electronic means on the "2002" and "Core" lists and through the ECF system.

/s/ Paul S. Bliley, Jr.  
Paul S. Bliley, Jr.

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